

1 ADAM GANZ, ESQ.  
Nevada Bar No. 6650  
2 MARJORIE HAUF, ESQ.  
Nevada Bar No. 8111  
3 CARA XIDIS, ESQ.  
Nevada Bar No. 11743  
4 GANZ & HAUF  
5 8950 W. Tropicana, Suite 1  
Las Vegas, NV 89147  
6 Tel: (702) 598-4529  
7 Fax: (702) 598-4529  
e-file@ganzhauf.com  
8 Attorneys for Plaintiffs

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

CASE NO: 2-19-CV-01019-JAD-BNW

11 DESHUN THOMAS, individually, and as  
12 Natural Parent and Guardian for L.J., and  
13 KRISTIN WOODS as Co-Guardian Ad Litem  
for L.J.,

14 Plaintiffs,

15 vs.

16 BEVERLY DADE, individually, and in her  
17 official capacity; RICHARD FULLER,  
18 individually, and in his official capacity;  
19 PATRICIA SCHULTZ, individually, and in her  
20 official capacity; PAT SKORKOWSKY,  
21 individually, and in his official capacity; CLARK  
22 COUNTY SCHOOL DISTRICT, a Political  
Subdivision of the State of Nevada, DOE  
TEACHER'S AIDE, in his/her official capacity;  
DOES I through X, inclusive; and ROES I  
through X, inclusive,

23 Defendants.  
24

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(FIRST REQUEST)**

25 Pursuant to Fed R. Civ. P. 6, Fed. R. Civ. P. 26, LR IA 6-1, LR IA 6-2, LR 7-1, and LR 26-  
26 4, the parties, by and through their respective counsel of record, stipulate and agree that there is good  
27 cause to extend the discovery deadlines in the operative discovery plan [ECF No. 35], as set forth  
28 below.



1 **I. Pursuant to LR 26-4(a), the parties stipulate that the following discovery has been**  
2 **completed:**

- 3 A. The parties have served initial disclosures pursuant to FRCP 26(a)(1);  
4 B. Defendants have propounded written discovery requests upon Plaintiffs;  
5 C. Plaintiffs have responded to written discovery requests.

6 **II. Pursuant to LR 26-4(b), the parties stipulate that they need to complete the following**  
7 **discovery:**

- 8 A. Depositions of the parties;  
9 B. Depositions of percipient and lay witnesses;  
10 C. Designation of initial experts and rebuttal experts;  
11 D. Depositions of expert witnesses;  
12 E. Production of additional documents;  
13 F. Additional written discovery requests;  
14 G. Any other discovery permitted by the Federal Rules of Civil Procedure and orders of  
15 the Court.  
16

17 **III. Pursuant to LR 26-4(c), the parties stipulate an extension is needed for the following**  
18 **reasons:**

19 Defendants in this matter have identified numerous documents in this matter which have not  
20 been produced, requesting that a protective order be entered in light of the documents' confidential  
21 nature. Counsel for the parties have been working together to come to an agreement regarding a  
22 protective order in this matter, but as of this time it has not been finalized. The parties anticipate that  
23 either a stipulation or a motion on this matter will be entered shortly. Given the impending expert  
24 disclosure deadline of December 19, 2019, and that various documents in this case have not yet been  
25 produced, including a police report and school records, the parties agree that an extension is needed.  
26 For these reasons, there is good cause to extend the discovery deadlines ninety (90) days.  
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1 **IV. Pursuant to LR 26-4(d), the parties stipulate to the following proposed schedule for**  
2 **completing all remaining discovery:**

3 The parties agree to extend all the discovery deadlines in this case by ninety (90) days, as set  
4 forth below:

	Current Deadline	Stipulated Deadline
Discovery cut-off	2/17/2020	5/18/2020
Amend pleadings/add parties	11/19/2019	2/17/2020
Initial expert disclosures	12/19/2019	3/19/2020
Rebuttal expert disclosures	1/17/2020	4/17/2020
Interim status report	12/18/2019	3/18/2020
Dispositive motions	3/18/2020	6/16/2020
Joint pre-trial order	4/17/2020 (if dispositive motions are filed, 30 days after the entry of the court's ruling on said motions)	7/17/2020 (if dispositive motions are filed, 30 days after the entry of the court's ruling on said motions)

17 DATED this 18th day of November, 2019.

18 /s/ Marjorie Hauf

19 Marjorie Hauf, Esq.  
20 Nevada Bar No. 8111  
21 Ganz & Hauf  
22 8950 W. Tropicana Ave, Ste 1  
Las Vegas, NV 89147  
*Attorneys for the Plaintiffs*

DATED this 18th day of November, 2019.

/s/ Crystal Herrera

Crystal Herrera, Esq.  
Nevada Bar No. 12396  
Clark County School District  
Office of General Counsel  
5100 West Sahara Avenue  
Las Vegas, NV 89164  
*Attorneys for Defendants*

23 **ORDER**

24 IT IS SO ORDERED.

25   
26 UNITED STATES MAGISTRATE JUDGE  
27

28 DATED: November 19, 2019